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Attorney for Ferdinand Richard Balcar, Jr.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA

Plaintiff,

V.

FERDINAND RICHARD BALCAR, JR.,

Defendant.

Case No. 2:96-cr-00046-KJD-PAL

**Stipulation to Continue Supplement's
Deadline to Motion for
Compassionate Release
(Fourth Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason Freirson, United States Attorney, and Robert Ellman, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi Ojeda, Assistant Federal Public Defender, counsel for Ferdinand Richard Balcar, Jr., request that the due date for Mr. Balcar's Supplement to Motion for Compassionate Release (ECF No. 249), be extended until February 7, 2023 and the Government will have until February 21, 2023, to file a response.

This Stipulation is entered into for the following reasons:

1. Counsel for defense needs additional time to gather information to supplement Mr. Balcar's request for compassionate release.
2. The government does not oppose this request.
3. Mr. Balcar does not object to the continuance.

4. The additional time requested by the stipulation is made in good faith and not for purposes of delay.

This is the fourth request for a continuance of the supplement deadline.

DATED this 31st of January, 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By s/ Heidi Ojeda
HEIDI OJEDA
Assistant Federal Public Defender

By /s/ Robert Ellman
ROBERT ELLMAN
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

FERDINAND RICHARD BALCAR, JR.,

Defendant.

Case No. 2:96-cr-00046-KJD-PAL

ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to extend Deadline for filing his Supplement to Motion for Compassionate Release, that the Defendant's deadline to file his Supplement is extended until February 7, 2023, and the Government will have until February 21, 2023, to file a response.

DATED this 1st day of February, 2023.

Kerry D.

UNITED STATES DISTRICT JUDGE